

1 GIA N. MARINA  
Nevada Bar No. 15276  
2 **CLARK HILL PLLC**  
1700 South Pavilion Center Drive, Suite 500  
3 Las Vegas, Nevada 89135  
E-mail: gmarina@clarkhill.com  
4 Telephone: (702) 862-8300  
Facsimile: (702) 778-9709  
5 *Attorney for Defendant*  
6 *National Consumer Telecom & Utilities*  
*Exchange, Inc.*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 DEBORAH DESALVO,

11 Plaintiff,

12 vs.

13 NATIONAL CONSUMER TELECOM &  
14 UTILITIES EXCHANGE, INC. and CLARITY  
SERVICES, INC.,

15 Defendants.  
16  
17

**Case No. 2:24-cv-01778-JCM-NJK**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE, INC. TO FILE ANSWER**

**FIRST REQUEST**

18 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has  
19 requested an extension of time to answer, move or otherwise respond to the Complaint in this  
20 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY  
21 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or  
22 otherwise respond to the Complaint in this action is extended from October 22, 2024 through and  
23 including **November 21, 2024**. The request was made by NCTUE so that it can have an opportunity  
24 to collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff

25 //

26 //

27 //

28

1 approves. This stipulation is filed in good faith and not intended to cause delay.

2  
3 Respectfully submitted, this 21<sup>st</sup> day of October, 2024.

4  
5 CLARK HILL PLLC

6 By: /s/Gia N. Marina  
7 Gia N, Marina  
8 1700 South Pavilion Center Drive, Suite 500  
9 Las Vegas, Nevada 89135  
10 Telephone: (702) 862-8300  
11 Facsimile: (702) 778-9709  
12 Email: gmarina@clarkhill.com  
13 *Attorney for Defendant National Consumer*  
14 *Telecom & Utilities Exchange, Inc.*


**No opposition**

/s/Gerardo Avalos

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos  
Nevada Bar No. 15171  
FREEDOM LAW GROUP  
8985 S. Eastern Ave., Suite 350  
Henderson, NV 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
Email: ghaines@freedomlegalteam.com  
Email: gavalos@freedomlegalteam.com

*Attorneys for Plaintiff*

15  
16  
17  
18 IT IS SO ORDERED:

19   
20 United States Magistrate Judge

21 DATED: October 22, 2024  
22  
23  
24  
25  
26  
27  
28